

## **Remarks**

Applicants respectfully request reconsideration of this application as amended.

Claims 1, 9, 16 and 19 have been amended. Claims 2-3, 6, 11 and 27-30 have been previously cancelled. Therefore, claims 1, 4-5, 7-10 and 16-22 are presented for examination.

Claims 1, 6-8, and 16-18 stand rejected under 35 U.S.C. §102(e) as being anticipated by Stepp, III (U.S. Patent No. 6,487,463). In addition, claims 4-5, 11 and 21 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Stepp. Applicants submit that the present claims are patentable over Stepp.

Stepp discloses a system for actively cooling an electronic device. See Stepp at Abstract. Stepp further discloses a controller 320 that is coupled to temperature sensors 314 and cooling fans 316. The controller 320 monitors the temperature of components 302-312 through the temperature sensors 314. See Stepp at col. 6, ll. 14-19 and Figure 3. The controller 320 is coupled to cooling fans 316 via FAN C and FAN M connections. The FAN C connections are used to control the rotational speed of each cooling fan 316. See Stepp at col. 6, ll. 22-24. The FAN M connections are used to monitor each cooling fan 316 to detect failure of a cooling fan. See Stepp at col. 6, ll. 56-58.

Claim 1 of the present application recites a central management agent to monitor each of a first and second set of field replaceable units via a first and second management bus, and to transmit signals to control each of the first and second sets of field replaceable units via the first and second management buses. Applicants submit that Stepp fails to disclose such a feature. Stepp discloses that controller 320 is coupled to each cooling fan 316 via two separate connections (FAN C and FAN M). Controller 320 controls the cooling fans via the

FAN C connection and monitors the cooling fans via the FAN M connection. Accordingly, the controller in Stepp requires two separate connections, one to monitor and one to control the fans, as opposed to one connection which both controls and monitors. Therefore, claim 1 is patentable over Stepp. Claims 3-5 depend from claim 1 and include additional features. Therefore, claims 3-5 are also patentable over Stepp.

Claim 16 recites a central management agent to monitor temperature sensors and fan trays via a first and second management bus, and to transmit signals to control activation of one or more of the fan trays based upon signals received from one or more of the temperature sensors via the first and second management buses. Accordingly, for the reasons described above with respect to claim 1, claim 16 is patentable over Stepp. Because claims 17-22 depend from claim 16 and include additional features, claims 17-22 are also patentable over Stepp.

Claims 8-10 and 19-20 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Stepp in view of Holland (U.S. Patent No. 5,367,669). Applicants submit that the present claims are patentable over Stepp in view of Holland.

Holland discloses a fault tolerant disk array control system. See Holland at Abstract. However, Holland does not disclose a central management agent to monitor each of a first and second set of field replaceable units via a first and second management bus, and to transmit signals to control each of the first and second sets of field replaceable units via the first and second management buses.

As discussed above, Stepp does not disclose such a feature. Since neither Stepp nor Holland a central management agent to monitor each of a first and second set of field replaceable units via a first and second management bus, and to transmit signals to control

each of the first and second sets of field replaceable units via the first and second management buses, any combination of Stepp and Holland would not disclose the feature. Therefore, the present claims are patentable over Stepp in view of Holland.

Claim 22 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Stepp in view of Jewett et al. (U.S. Patent No. 6,073,251). Applicants submit that the present claims are patentable over Stepp in view of Jewett.

Jewett discloses a computer system with a fault tolerant configuration. See Jewett at Abstract. However, Jewett does not disclose a central management agent to monitor each of a first and second set of field replaceable units via a first and second management bus, and to transmit signals to control each of the first and second sets of field replaceable units via the first and second management buses.

As discussed above, Stepp does not disclose such a feature. Since neither Stepp nor Jewett disclose a central management agent to monitor each of a first and second set of field replaceable units via a first and second management bus, and to transmit signals to control each of the first and second sets of field replaceable units via the first and second management buses, any combination of Stepp and Jewett would not disclose the feature. Therefore, the present claims are patentable over Stepp in view of Jewett.

Applicants respectfully submit that the rejections have been overcome and that the claims are in condition for allowance. Accordingly, applicants respectfully request the rejections be withdrawn and the claims be allowed.

The Examiner is requested to call the undersigned at (303) 740-1980 if there remains any issue with allowance of the case.


Applicants respectfully petition for an extension of time to respond to the outstanding Office Action pursuant to 37 C.F.R. § 1.136(a) should one be necessary. Please charge our Deposit Account No. 02-2666 to cover the necessary fee under 37 C.F.R. § 1.17(a) for such an extension.

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

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